

ORIGINAL



EX PARTE OR LATE FILED

OCT 23 2002

October 23, 2002

**NOTICE OF EX PARTE
PRESENTATION**

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW B204
Washington, DC 20554

Re: **Federal-State Joint Board on Universal Service**
CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200,
95-200.95-116.98-170 and NSD File No. L-00-72

Dear Ms. Dortch:

The attached written *Ex Parte* Presentation concerning the above-referenced proceeding ~~was~~ sent to the Honorable Michael K. Powell, by the undersigned on October 23, 2002, on ~~behalf~~ of Palmetto Rural Telephone Cooperative. In accordance ~~with~~ FCC Rule 1.1206(b)(1)¹, this Notice of *Ex Parte* Presentation and a copy of the referenced *Ex Parte* Presentation are being filed ~~with~~ you electronically for inclusion in the public record. Should you have any questions, please contact me at 843-538-2020.

Sincerely,

H.J. Dandridge III
General Manager

cc: Commissioner Kathleen Q. Abemathy
Commissioner Michael Copps
Commissioner Kevin Martin

File of documents received
DATE RECEIVED

¹ 47 C.F.R. § 1.1206(b)(1).

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October 23, 2002

EX PARTE PRESENTATION

Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW, Room 8 B201
Washington, DC 20554

**Re: Federal-State Joint Board on Universal Service,
CC Docket Nos. 96-45, 98-171, 90-571, 92-237,
99-200.95-200.95-116.98-170 and NSD File No. L-00-72;**

Dear chairman Powell:

I write to **you** on behalf of Palmetto Rural Telephone Cooperative to indicate support for the ~~interim~~ universal service contribution methodology proposed by the United States Telecom Association (USTA). Palmetto Rural Telephone Cooperative believes that adoption of the interim methodology will **best** ensure that sufficient universal support will continue to be available to eligible carriers. Palmetto Rural Telephone Cooperative urges the Federal Communications Commission (FCC) to continue to ~~examine~~ the creation of a long-term contribution methodology while the industry operates under the interim methodology.

The interim methodology should be based on interstate end-user revenues **as** a contribution base. The FCC should ~~use~~ a "collect and remit" system. Under ~~this~~ system carriers would remit payments **based** on the application of the USAC percentage to the ~~interstate retail~~ revenues actually collected. The FCC should **raise** the "safe harbor" contribution limit for wireless providers to 20-28 percent unless the wireless provider *can* determine its *actual* interstate retail revenue, and the safe harbor percentage should be applied to wireless providers on a company-wide **basis**. Competitive local exchange carriers (CLECs) should ~~impute~~ **an** amount **equal** to the subscriber line charge (SLC) assessed by the incumbent local exchange carrier (ILEC) in a CLEC's ~~service~~ area. CLECs should be provided with the **option** of reporting the ~~imputation~~ **based on** the **actual** SLC amount assessed by the ~~ILEC~~ or an amount **equal** to the nationwide SLC cap. All broadband and broadband ~~service~~ providers should contribute to universal ~~service~~ support on an equivalent basis. Finally, the FCC should impose a cap on the ~~recovery~~ of administrative, billing and overhead costs that contributors to universal service support programs are allowed to include in the universal service charge collected on customers' bills.

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Honorable Michael K. Powell
October 23, 2002
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The interim contribution methodology is not a substitute for the principles and long-term connection-based proposal presented by USTA in its comments and **reply** comments filed in this proceeding on April 22, 2002, and May 13, 2002, respectively. It is necessary, though, in order to **allow** the FCC more time to address the administrative and legal concerns related to the methodologies **currently** under review.

Sincerely,

A handwritten signature in black ink, appearing to read "H.J. Dandridge III", with a stylized flourish at the end.

H.J. Dandridge III
General Manager

cc: Commissioner Kathleen Q. Abemathy
Commissioner Michael Copps
Commissioner Kevin Martin